

## MOTION TO DRAW ON RETAINER COVER SHEET

Motion to Draw on Retainer of Quilling, Selander, Lownds, Winslett & Moser, P.C.

for the time period of April 6, 2020 through May 31, 2020

Capacity: Counsel to Bowie Real Estate Holdings, LP Chapter: 11

Debtor/Case: In re Bowie Real Estate Holdings.; Case No. 20-70115

Bankruptcy Petition filed on: April 6, 2020

Retainer Received: \$6,926.00 Amount Previously Paid: \$0.00

### **Amount Requested:**

Fees: \$6,838.50

Expenses: \$87.50

Other: \_\_\_\_\_

**Total:** \$6,926.00

### **Reductions:**

Vol. Fee Reductions: \$0.00

Expense Reductions: \$0.00

**Total Reductions:** \$

### **Expenses:**

Copies per page: \$0.20

Faxes per page: No Charge

Postage & Copies: \$83.50

Copies: \_\_\_\_\_

Other: Texas Sec. State search: \$4.00.

West Law/ Lexis: \_\_\_\_\_

### **Hourly Rates:**

Highest – Lowest Attorney \$350

Hours Billed: 25.50

Average: \$339.00

Paralegal/Clerical

\$135

/s/ John Paul Stanford  
Signature

October 26, 2020  
Date

John Paul Stanford  
QUILLING, SELANDER, LOWNDS,  
WINSLETT & MOSER, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201  
(214) 871-2100 (Telephone)

Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

IN RE:	§	
	§	
BOWIE REAL ESTATE HOLDINGS, LP	§	CASE NO. 20-70115-HDH-11
	§	(Chapter 11)
DEBTOR	§	

**FIRST MOTION TO DRAW ON RETAINER BY QUILLING, SELANDER,  
LOWNDS, WINSLETT & MOSER, P.C. AS GENERAL COUNSEL FOR DEBTOR**

**NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN FOURTEEN (14) DAYS FROM DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.**

**TO THE HONORABLE U.S. BANKRUPTCY JUDGE:**

Quilling, Selander, Lownds, Winslett & Moser, P.C. (“QSLWM”) attorneys for Val’s Food with a Twist, LLC (“Debtor”) files its First Motion to Draw on Retainer as follows:

1. On April 6, 2020 (the “Petition Date”) Debtor filed a petition for relief under chapter 11 of the Bankruptcy Code. The Debtor remains in possession of its assets and is continuing to operate and manage its business as a debtor-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code. QSLWM was employed as bankruptcy counsel was on June 17, 2020.

2. QSLWM is holding \$6,926.0000 in a trust account as its retainer for legal services associated with the Debtor's chapter 11 case.

3. Attached hereto as Exhibit "A" is a copy of the monthly invoices of QSLWM for the time period of April 6, 2020 through May 31, 2020. The invoices contain a detailed description of the services performed, time spent, hourly rates charged, the names of the attorneys and paralegals performing the work, and expenses incurred by QSLWM as counsel for the Debtor. The invoice shows the total fees in the amount of \$8,645.00 and expenses in the amount of \$87.50 for this time period.

4. The professionals that have performed service during this time period are as follows:

<u>Name</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>License Date</u>
John Paul Stanford	Attorney	\$350.00	1989
Christine Price	Legal Assistant	\$135.00	

5. Pursuant to Local Bankruptcy Rule 2016(b), QSLWM seeks authority to draw on its retainer in the amount of \$6,926.00 to be applied to the expenses and then time shown on the attached invoice for the time period of April 6, 2020 through May 31, 2020. This is the first motion to draw upon retainer filed in this case.

Respectfully submitted,

QUILLING, SELANDER, LOWNDS,  
WINSLETT & MOSER, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201  
(214) 871-2100 (Telephone)  
(214) 871-2111 (Facsimile)

By: /s/ John Paul Stanford  
John Paul Stanford  
State Bar No. 19037350

ATTORNEYS FOR THE DEBTOR

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion has been served by electronic transmission via the Court's CM/ECF system upon all parties registered to receive electronic notice in this bankruptcy case, or otherwise by U.S. first class mail, postage prepaid, on this 26<sup>th</sup> day of October, 2020, upon those parties listed on the attached service list not receiving ECF notification.

/s/ John Paul Stanford